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6 Attorneys for Plaintiff

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

**3:08-cr-00044-LRH-VPC**

9 UNITED STATES OF AMERICA, )  
 10 Plaintiff, )  
 v. )  
 11 JANET LOUISE JOHNSON, )  
 12 Defendant. )

INDICTMENT FOR VIOLATIONS OF:

TITLE 18, UNITED STATES CODE,  
 SECTIONS 1343 and 1346 - Wire Fraud  
 (Count One)

TITLE 18, UNITED STATES CODE,  
 SECTIONS 7(3) and 661 - Theft of Union  
 Funds (Counts Two through Eight)

15 THE GRAND JURY CHARGES THAT:

16 COUNT ONE  
 (Wire Fraud)

17 1. At all times material to this indictment, JANET LOUISE JOHNSON, defendant herein,  
 18 was the treasurer of the American Federation of Government Employees Local 2152 (Union), 1000  
 19 Locust Street, Reno, Nevada.

20 2. From on or about January 16, 2006 and continuing to on or about September 27, 2006, in  
 21 the District of Nevada, and elsewhere, the defendant devised and intended to devise a scheme and  
 22 artifice to defraud and deprive the Union and its members of their right to the honest services of the  
 23 treasurer of the Union, performed free from deceit, favoritism, bias, self-enrichment, self-dealing,  
 24 concealment, and conflict of interest.

25 3. The objects of the defendant's scheme and artifice to defraud and deprive were  
 26 accomplished as follows:

a. It was part of the scheme and artifice to defraud and deprive that the defendant would and did use for her own personal use the Union's credit card that had been issued to her for official Union business only.

b. It was further part of the scheme and artifice to defraud and deprive that the defendant would and did use the Union's checking account and Union funds to pay for the personal property and services she obtained through the use of the Union's credit card.

c. As a result of the defendant's unauthorized personal credit card charges, the Union and its members suffered a loss in the amount of \$11,251.44.

4. On or about August 26, 2006, in the District of Nevada, for the purpose of executing the aforesaid scheme and artifice to defraud and deprive, the defendant knowingly transmitted and caused to be transmitted by means of a wire communication in interstate commerce certain signs, signals, and sounds, that is, a credit card approval transaction between Sparks, Nevada and Omaha, Nebraska.

All in violation of Title 18, United States Code, Sections 1343 and 1346.

COUNT TWO  
(Theft of Union Funds)

On or about February 24, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, that is, money of the American Federation of Government Employees Local 2152 of a value of \$992.41; all in violation of Title 18, United States Code, Sections, 7(3) and 661.

## COUNT THREE (Theft of Union Funds)

On or about March 22, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the

1 Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the  
2 United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and  
3 purloin, the personal property of another, that is, money of the American Federation of Government  
4 Employees Local 2152 of a value of \$744.94; all in violation of Title 18, United States Code, Sections,  
5 7(3) and 661.

6 COUNT FOUR  
7 (Theft of Union Funds)

8 On or about April 19, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant  
herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the  
9 Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the  
10 United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and  
11 purloin, the personal property of another, that is, money of the American Federation of Government  
12 Employees Local 2152 of a value of \$383.63; all in violation of Title 18, United States Code, Sections,  
13 7(3) and 661.

14 COUNT FIVE  
15 (Theft of Union Funds)

16 On or about May 18, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant  
herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the  
17 Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the  
18 United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and  
19 purloin, the personal property of another, that is, money of the American Federation of Government  
20 Employees Local 2152 of a value of \$1,317.65; all in violation of Title 18, United States Code, Sections,  
21 7(3) and 661.

22 COUNT SIX  
23 (Theft of Union Funds)

24 On or about July 1, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant  
herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the  
25 Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the  
26  
27

1 United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and  
2 purloin, the personal property of another, that is, money of the American Federation of Government  
3 Employees Local 2152 of a value of \$1,308.43; all in violation of Title 18, United States Code, Sections,  
4 7(3) and 661.

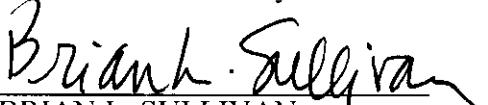
5 COUNT SEVEN  
6 (Theft of Union Funds)

7 On or about July 21, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant  
8 herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the  
9 Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the  
10 United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and  
11 purloin, the personal property of another, that is, money of the American Federation of Government  
12 Employees Local 2152 of a value of \$1,354.02; all in violation of Title 18, United States Code, Sections,  
13 7(3) and 661.

14 COUNT EIGHT  
15 (Theft of Union Funds)

16 On or about August 30, 2006, in the District of Nevada, JANET LOUISE JOHNSON, defendant  
17 herein, at a place within the special maritime and territorial jurisdiction of the United States, namely, the  
18 Ioannis A. Lougaris Veteran's Affairs Medical Center, Reno, Nevada, on land acquired for the use of the  
19 United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and  
20 purloin, the personal property of another, that is, money of the American Federation of Government  
21 Employees Local 2152 of a value of \$966.54; all in violation of Title 18, United States Code, Sections,  
22 7(3) and 661.

23 A TRUE BILL:

24  
25 GREGORY A. BROWER  
26 United States Attorney  
27   
28 BRIAN L. SULLIVAN  
Assistant United States Attorney

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*/S/*  
FOREPERSON